

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

| <b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>  | <b>Plaintiffs' Executive Committee for Commercial Claims</b>                        |
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| Ronald L. Motley (1944-2013)<br>Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i><br>MOTLEY RICE LLC<br>James P. Kreindler, <i>Co-Chair</i><br>KREINDLER & KREINDLER LLP | Stephen A. Cozen, <i>Co-Chair</i><br>Sean Carter, <i>Co-Chair</i><br>COZEN O'CONNOR |
| Andrew J. Maloney III, <i>Co-Liaison Counsel</i><br>KREINDLER & KREINDLER LLP<br>Robert T. Haefele, <i>Co-Liaison Counsel</i><br>MOTLEY RICE LLC                                     | J. Scott Tarbutton, <i>Liaison Counsel</i><br>COZEN O'CONNOR                        |

VIA ECF

February 17, 2021

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees ("PECs") respectfully write to request a two-week extension, from February 22, 2021 to March 8, 2021, for Plaintiffs to file their opposition to the Republic of the Sudan's motion to dismiss at ECF Nos. 6574-6575.

The extension is necessary in light of several commitments and scheduling matters that have arisen since the Court set the briefing schedule for Sudan's motion to dismiss. In addition to expert discovery and ongoing video depositions of Saudi government officials over the next several weeks,<sup>1</sup> Plaintiffs received notification from the Swedish Court confirming the hearing for testimony of witness Mohdar Abdullah to be held on March 1 and 2, with March 4 and 5 being held in reserve. Moreover, the DOJ has communicated that the FBI will be making additional productions in the coming days, one of which was received last night and another of which is expected today, which need to be analyzed on an expedited basis in advance of the Abdullah deposition. Given these recent developments and other commitments, and the need to coordinate a consolidated response from many separate camps on the Plaintiffs' side, an extension of the briefing schedule with respect to Sudan is needed.

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<sup>1</sup> Depositions are presently scheduled for February 23-24 (Saud al Ghudaian), March 9-10 (Abdullah al Awad), and March 11-12 (Sami al Ibrahim).

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Counsel for Sudan has indicated its client does not object to the requested extension.

For the foregoing reasons, the PECs respectfully request that the Court endorse the following revised briefing schedule:

- Plaintiffs will file their opposition to Defendant Sudan's motion to dismiss on or before March 8, 2021; and
- Defendant Sudan will file its reply brief in support of its motion to dismiss on or before April 7, 2021.

We thank Your Honor in advance for the Court's consideration of this request.

Respectfully submitted,

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*On behalf of the MDL 1570 Plaintiffs' Exec.  
Committees*

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Committees*